

Honorable Judge Richard A. Jones

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**UNITED STATES DISTRICT COURT**  
6  
for the WESTERN DISTRICT of WASHINGTON  
7

8  
Ashley M. Gjovik (*pro se*),  
9

10 Plaintiff(s),  
v.  
11

State of Washington, et al.  
12

Defendant(s).  
13

CASE NO. 2:22-cv-00807-RAJ-BAT

APPENDIX WITH EXHIBITS

FOR EMERGENCY MOTION FOR  
INJUNCTIVE RELIEF

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15  
**APPENDIX WITH EXHIBITS**  
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**EXHIBIT A**  
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1 **EXHIBIT A: Examples of References to Gov Charges in Petition & Testimony**

2 Note: see full Petition & Order for Restraining Order in Complaint Appendix, Exhibit B, pg4

3 **1. Petition for Restraining Order (see, Complaint, Exhibit B)**

4 *Pg3, written by Petitioner (content disputed by Gjovik in state Reply & Motions)*

5 Out of desperation, I connected with a mutual friend, Melissa McEwen, to try to get  
6 her to stop. She told this mutual friend she was doing it because I am cited in Apple,  
7 Inc's defense against her in one of her NLRB and DOL cases against the company.  
8 She told the mutual friend she would only stop engaging in the behavior if I  
promoted her Twitter account (~8,000 followers) on my own Twitter account  
(~55,000), and promoted her GoFundMe (goal of \$100,000 for misc purposes). I  
refused to oblige, and sent a report to the FBI, suspecting that this was extortion

9 Pt for an Or for Protection – Harassment/Stalking (PTORAH, PTORSTK) – Page 3 of 7  
WPF UHST-02.0200 (07/2019) – RCW 10.14.040 .800, RCW 7.92.030  
KCDC July 2019

10  
11 *Pg4, written by Petitioner (content disputed by Gjovik in state Reply & Motions, & now in  
12 federal cases)*

13 How did the respondent make these statements?  in person  mail/written notes  
 e-mail  text  phone  social media (such as Facebook and Twitter)  
 other (describe): \_\_\_\_\_.

14 B. Describe other incidents of harassment or stalking. For each incident, include the date, time (on or  
about), location, what was said, how statements were made, and what was done to a victim.

15 because of the monetary value associated with her demands in exchange to stop harassing  
16 me. Another friend, Janneke Parrish, also tried to get her to stop, she said she made similar  
possibly extorting requests to stop.

17 I also reported her behavior to her University, and to Twitter. Neither of these seems to have  
detected her from continuing to engage in the harassment.

18 On January 11, 2022, she filed an NLRB charge against Apple, Inc, claiming that I was  
19 harassing her on Apple's behalf. I have not harassed her. On January 31, 2022, she published  
a "memo" for that charge containing defamatory and private information about me (and  
others) on a platform called Scribd. Ordinarily, this information would be redacted and  
confidential by the NLRB. She has shopped this information around to the press in an  
attempt to make it public record, for malicious purposes. Much of the information she has  
reposted is my personal medical information, which I have not given her consent to share.

20  
21 <https://www.scribd.com/documents/555822358/US-NLRB-Ashley-Gjovik-Apple-Inc-Jan-10-2022-Charge-Draft-1>

22 [https://twitter.com/ashleygjovik/with\\_replies](https://twitter.com/ashleygjovik/with_replies) (there's a lot more here)

23  
24 *Pg 6, written by Petitioner, (content disputed by Gjovik*

1  
2     12. Is there any other litigation between the victim/s and the respondent? This includes all matters -  
3       pending or past - such as parenting plans, landlord-tenant disputes, employment disputes, or property  
4       disputes. If yes, provide case number/s if known, type of case, and name of court:

5       NLRB Charge CA-288816 - charge against Apple, Inc, which contains false/misleading  
6       information about me made in bad faith by Ashley Gjovik

7  
8     ➤ Requests

9  
10    2. TRO Denial (see, Complaint, Exhibit C, pg5)

11    Written by Judge O'Toole

- 12     The harassment protection order petition does not list specific incidents and  
13       approximate dates of harassment.  
14     The reasons for denial of the order are:

15       Respondent lives in California. There is no emergency irreparable harm if emergency order not issued. Many  
16       of the complained-of actions serve a lawful purpose (filing with NLRB) and involve free speech. However,  
17       other allegations may have merit, thus this Court will set a full-order hearing.

- 18     A preponderance of the evidence has not established that there has been harassment.  
19     Other:

20     Other:

21       Respondent shall not make any statements or posts or other publications about Petitioner, including, but not  
22       limited to, petitioner's medical information, petitioner's family, petitioner's names, on any social media or internet  
23       or other medium. Nothing about this Order prohibits Respondent from testifying in administrative or judicial  
24       proceedings.

1           **4. Petitioner's Written Statement, Submitted Feb 15 2022 & Incorporated March 1**  
2           **2022**

3  
4           *Note: full statement is 7 pages, single spaced.*

5           Scarlett v. Gjovik  
6           King County Court  
7           2/15/2022

22JV01704K

FILED

FEB 15 2022

KGDC-East Division  
Redmond Courthouse

8           Statement by Cher Swan Scarlett

9           Your honor:

10          I am speaking for myself today as I do not have the financial means to afford an attorney.  
11          Please understand I lack experience in legal proceedings, and I have struggled with advocating  
12          for myself in the past, often being victimized by bullies and doing nothing. As Ms. Gjovik said  
13          when she reached out to me, I have a lot of courage in speaking up for others. I have not done  
14          well in standing up for myself in the past.

15          ///

16          We started a movement called #AppleToo together, but after she made other members of the  
17          group uncomfortable with her punching down on collective action, defensive aggression after  
18          constructive feedback about a racist Twitter post she made, and her wishes to use the  
19          movement as private leverage for her own cases against Apple, she voluntarily parted ways

20          ///

21          In late August of 2021, Ms. Gjovik shared with me that she had leaked information protected by  
22          our non-disclosure agreements to Zoe Schiffer of the Verge, and she was terminated a week  
23          later for those policy violations. Ms. Gjovik was later denied unemployment benefits by the state  
24          of California after they determined she was terminated for just cause, per her sharing the letter  
25          from unemployment on Twitter. I shared an opinion on the application Blind that it would be  
26          difficult to prove her retaliatory discharge claims to the NLRB and the Department of Labor  
27          because she had, in fact, leaked those documents. In December of 2021, she initiated a

28          ///

29

30

31

32

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34          EMR. MOTION FOR. INJ,  
35          CASE NO. 2:22-CV-00807-RAJ-BAT

PO BOX 119 SANTA CLARA, CA 95050  
(408) 883-4428

1 The only contact after that, was an email I sent her on February 5th, 2022, when I asked Ms.  
2 Gjovik to stop cyberharassing me, cyberstalking me and my family, and to delete and/or redact  
3 private or personal information about myself and my family (which included medical information  
4 about me, my minor daughter's my mother's and my husband's names, and my husband's old  
5 criminal history), defamatory assertions, and my social media posts and authored articles that  
6 could not be reasonably considered to be connected to her and her allegations against Apple. I  
7 informed her that her continued posts about my family were causing them to also be  
8 cyberharassed, and that CPS was receiving false reports about the safety and wellbeing of my  
9 child.

10 Ms. Gjovik not only misrepresented this email, but escalated in her defamation, claiming I was  
11 not only harassing and defaming her, but that I was making false calls to authorities or  
12 emergency services to have armed officers dispatched to her home (she referred to this as  
13 "SWATING"), stalking her, threatening her, suing her, coercing her, demanding that she destroy  
14 evidence, colluding with Apple to obstruct justice, and that I am under investigation by the  
15 federal government for obstruction of justice and witness intimidation. None of these things are  
16 true.

17     ///

18     Ms. Gjovik stated she was cyberharassing me because I was testifying against her on behalf of  
19 Apple in her cases against them, and further because I reported her conduct to the FBI. This is  
20 untrue, as Alexander Hajduk, an investigating officer of the NLRB, and I both told her. I was  
21 cited in their defense with a text message conversation she posted on Twitter, not testifying  
22 against her.

23     ////

24     The Director of Security of the NLRB, Raymond Hankins, and the supervisory Field Attorney for  
25 Region 32, Catherine Ventola, which is handling Ms. Gjovik's NLRB charge which names me,  
26 both recommended over the phone that I report Ms. Gjovik's conduct to federal and local  
27 authorities, on or around January 25, 2022, and on or around February 4, 2022, respectively.  
28 They further advised that they had had numerous operations meetings to discuss how to handle  
29 Ms. Gjovik's conduct and my personal and private information being published without my or my  
30 family's consent. They advised they would redact information per Exemption 6 of FOIA, and  
31 linked me to the relevant guide from the DOJ, but said they did not have jurisdiction over her

posting that information elsewhere, and again advised that I seek remedy through those with the jurisdiction to take action, and that they could not get involved aside from redacting information in the charges.

Ms. Gjovik has taken it upon herself to publish information in documents related to her charges that would be redacted per the DOJ's guidelines. I reported this to Twitter, to Scribd, and to her web host, register.com. Scribd removed the posts for abuse, and Ms. Gjovik reuploaded it, and Scribd removed them again. Ms. Gjovik then uploaded it to her personal website, and the host is considering whether or not it breaks their rules against abuse of their services.

Ms. Gjovik deleted most of the private information from Twitter on February 5th, 2022, after I tweeted that I had testified for SB 5628, the anti-cyberharassment bill that passed through the Senate chambers unanimously, and would be moving forward with hiring a process server for this anti-harassment hearing because of Ashley's public response and misrepresentations of my plea for her to stop cyberharassing me. However, she did not redact any information in her memo, which is now hosted on her website and posted numerous times to her Twitter, and added additional private information and defamatory statements.

////

Ms. Gjovik's cyberharassment of me appears to be in part for exercising my own first amendment rights in expressing my opinion that her retaliatory discharge case would be hard to prove because of the bonafide fact that she had leaked private documents about unreleased intellectual property owned by Apple to the press, and additionally because I was cited in Apple's defense case in her charges against the company. I took the time to apologize for exercising those first amendment rights, because it clearly hurt her feelings, despite my right to say such things, and her public assertions that she supported such rights.

////

seeks to do me harm emotionally and to make the general public believe damaging lies with her actions, and it is escalating. She is attempting to abuse government processes to attempt to do me further harm.

If this is not criminal cyberharassment, blackmail and/or extortion, and retaliation for reporting such things, then I do not know what is. And if this type of speech is protected, who then becomes responsible for the damage that this woman, and others, cause, for their own selfish, malicious purposes?

Ms. Gjovik has one goal: to destroy me publicly. No one deserves this.

I have nowhere else to turn.

Please help me find relief from the fear of my well-being, and the safety of myself, my child, and the rest of my family.

1 Attached to Statement

2 SB 5628 testimony

3 Chair and committee members -

4 ////

5 My last recourse has been to seek an anti-harassment order, and all I keep hearing is that people  
6 have 1st amendment rights, and that the only reason I was given a hearing is because of the  
7 private information she's posted.

8 E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik,  
9 King County District Court, case no. 22CIV01704KCX (1 March2022).

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11  
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16  
17  
18 **EXHIBIT B**

1 EXHIBIT B: Transcript Excerpts from March 1 Hearing

2 35

3 1 communications with Kate as -- in your witness statements.

4 2 I actually have those conversations that are being

5 3 referenced. I'm wondering if you would like to hear them?

6 4 MR. BLAIR: Is there a question, Your Honor?

7 5 THE COURT: Yeah, basically right now we're supposed to be

8 6 asking your questions that you have specifically for

9 7 Ms. Gjovik.

10 8 Q. (By Ms. Scarlett) Okay. I guess I'd like to know what

11 9 conversations did I have with Kate that you viewed were

12 10 abusive? Do you have any particular comments?

13 11 A. I don't believe I ever made that allegation.

14 12 Q. Okay. I'm curious then what her testimony has to do with

15 13 your harassment of me?

16 14 MR. BLAIR: Is there a question, Your Honor?

17 15 THE COURT: Yes, she asked a -- you can repeat your

18 16 question.

19 17 Q. (By Ms. Scarlett) My question is: I'm wondering what Kate

20 18 Rotondo's testimony has to do with your harassment of me?

21 19 A. Kate's testimony -- and I don't want to speak on Kate's

22 20 behalf, she wrote a very thoughtful witness statement that

23 21 she should take at her face value. But she was trying to

24 22 point out a pattern and practice of not just you harassing

25 23 us, but as soon as we tried to stand up for ourselves, you

beginning attacking us and saying we were harassing you and

trying to cut off communications so we could no longer even

23 March 1 2022 Transcript: Page 35

36

defend ourselves against your harassment, I believe was the point. And that seems very relevant to this.

Your Honor, as my filings included, the judge directions for domestic violence retaliatory litigation, which is what this very much feels like. If not retaliation for the federal charges, it seems like this is the retaliation for me, asking, pleading for Ms. Scarlett to stop harassing me, which she had been since September and instead she switched the offender and victim.

10 Q. So I wrote you one single email in which I apologized for  
11 the two things that I said in one single post. How does  
12 that -- you haven't presented anything that I have actually  
13 said to be harassment. And when I've asked you -- which  
14 again, you just said that I harassed Kate, I have our  
15 messages here. She was reTweeting things that you were  
16 posting that was defamatory, and I said | to her that I  
17 blocked her because she was lying about me.

MR. BLAIR: Is this a question or is it testimony or argument?

MS. SCARLETT: I'm just -- I'm trying to understand how she's both saying that I harassed these other two women, which there is no evidence that I have harassed them, and I have evidence that I was not harassing either of them, and what that has to do with Ms. Gjovik's harassment of me.

THE COURT: So what's the --

*March 1 2022 Transcript: Page 36*

1                   1                   MR. BLAIR: That sounds like an argument, Your Honor.

2                   2                   THE COURT: Just tell us the question.

3                   3                   Q.     (By Ms. Scarlett) Why do you think -- why have you made  
4                   4                   statements like that that I am stalking anybody who --  
5                   5                   stalking you, coercing you, harassing you, intimidating you,  
6                   6                   threatening you, and telling people that bad things will  
7                   7                   happen to them if they support you?

8                   8                   Why were you saying that I was harassing, defaming,  
9                   9                   swatting, threatening, illegally coercing you to modify  
10                  10                  federal charges. Why we were saying -- it should be  
11                  11                  mentioned that I am currently under investigation by  
12                  12                  numerous federal agencies and law enforcement for federal  
13                  13                  witness intimidation and obstruction of justice.

14                  14                  Why have you said that I'm in active communication with  
15                  15                  Apple helping Apple in their campaign of harassment, threats  
16                  16                  and horror against the safety whistle blower. Why did you  
17                  17                  say I'll report you to Apple if I leak Apple's crimes? Why  
18                  18                  did you say --

19                  19                  MR. BLAIR: Your Honor, can we have some help here? I  
20                  20                  don't know what she's asking.

21                  21                  THE COURT: I just need a question, basically.

22                  22                  Q.     (By Ms. Scarlett) Why do you -- why do you believe that  
23                  23                  saying these things about me and posting this personal  
24                  24                  information about me is for a lawful purpose?

25                  25                  THE WITNESS: Your Honor, I'd like to object to this

22  
23                  March 1 2022 Transcript: Page 37

38

1           question. She's trying to compel me to testify on my  
2           federal charges.

3           THE COURT: Ma'am, you've got an attorney. He'll make  
4           whatever objections are necessary.

5           MR. BLAIR: I'm going to object for my client, Your Honor.  
6           At this point I don't see a question. What I hear is an  
7           argument.

8           THE COURT: She asked a question.

9           MR. BLAIR: That's what I think --

10          THE COURT: She asked a question and it is -- she wants to  
11          know how Ms. Gjovik thinks this serves a lawful purpose.

12          MR. BLAIR: What serves a lawful purpose?

13          THE COURT: Her posting the things that she's listed.

14          THE WITNESS: I'll answer --

15          MR. BLAIR: Ms. Gjovik, go ahead.

16          A. Yeah. These are part of my federal and state charges, which  
17          have already met *prima facie* for subsequent harassment after  
18          termination of my time at Apple.

19          I'm hesitant to testify to anything specific because it is  
20          part of the ongoing investigation.

21          And I will say, I am single handedly representing myself  
22          fighting the biggest company in the entire world with a long  
23          history of horrible labor abuses and intimidation of anyone  
24          challenging it. I'm terrified every single day since I  
25          started reporting Apple to the government. I'm terrified

23           1           for my safety.

1           8         And rebuttal, Ms. Scarlett.

2           9         MS. SCARLETT: You know, you said that, you know, your  
3           10      client has the right to post this information because of the  
4           11      First Amendment. But in her testimony, she said that the  
5           12      reason that she did so was because of something that I said  
6           13      publicly that she believed to be a lie, and that was that I  
7           14      said that her retaliatory discharge one is going to be tough  
8           15      to prove because she leaked IP. She actually posted the  
9           16      conversation that I had with her about that leaked IP.

10          17         And it's hard for me to hear her attorney now argue that  
11          18         she has the right to free speech when she did not give me  
12          19         that right myself.

13          20         That's it.

14          21         THE COURT: Okay. Thank you. So give me a minute here.

15          22         All right. So I've certainly heard the testimony, I've  
16          23      reviewed the documents. Both parties have produced a number  
17          24      of documents and a number of written statements, all of  
18          25      those are incorporated in by this reference, including the

19  
20         *March 1 2022 Transcript: Page 44*

21         22         And she told mutuals that because -- I had reached out to a  
22         23      mutual friend at the time -- who is no longer a friend of  
23         24      mine, who has actually provided written testimony in this --  
24         25      that I was concerned because something that Ashley told her

25  
26         *March 1 2022 Transcript: Page 12-13*

was not what Ashley had communicated to me multiple times, and all I suggested was to protect herself, she reach out and at least ask so that she could say that she did before she published possibly defamatory information about a company that was trying to harm all of us.

And after that, I came into this courtroom because it had continued to escalate. Saying things that I was trying to destroy her, that I was trying to have her swatted, and that's calling emergency services that are armed in order to -- in the hopes of having them physically harmed. I've never done that. I would never do that. Coercing her. Telling her to remove federal charges. Bullying her. Saying that I'm under investigation by numerous federal agencies and law enforcement.

So I wrote her an email after I came to court because ultimately, again, I did not want any of this to harm her career, to harm her, to do further harm to me. And I wrote this email and I was like, look, here's all these misconceptions that you've heard, here's the reality of them. And I even apologized for the things that I said that are nothing, you know, just that one comment that I made.

And she decided to escalate further instead. I said that at that point I had no choice but to hire a process server for this proceeding. And the way that she represented that was that I -- a member of Apple's global security hired

*March 1 2022 Transcript: Page 14*

1                   someone to track down and find her at her home and hand her  
2                   something physically. So, again, making these statements  
3                   that are -- not necessarily full on lies, but complete  
4                   misrepresentations that do nothing but to try to maliciously  
5                   frame that I have done something that I haven't done.

6                   With the NLRB charge -- I'm not bringing up the charge  
7                   specifically. I'm talking specifically about Ashley --  
8                   excuse me, Ms. Gjovik, posting -- publishing these things on  
9                   a platform called Scribd, which actually removed it for  
10                  account abuse. A platform of her website. These are not  
11                  government websites that are hosting these, these are things  
12                  that Ashley -- that Ms. Gjovik is writing herself and  
13                  publishing herself that she is claiming are related to these  
14                  federal charges. But they're really just her, and that's  
15                  who is publishing this information. She's just doing it  
16                  under the guise that it is federally protected.

14 *March 1 2022 Transcript: Page 15*

15                  9                   On January 11th: "I recommend you send this document  
16                  10                  retention notice and some sort of cease and desist missive  
17                  11                  to them now."

18 *March 1 2022 Transcript: Page 17*

19 SEE EXHIBIT E

EXHIBIT C

1  
2           **EXHIBIT C: Petitioner's Contradicting Statements**

3           Example 1: March 1 2022 hearing testimony by Petitioner, page 17:

4           14           She posted: "How are you claiming to run out of funds  
 5           15           when you can afford to support your daughter, but percocet,  
 6           16           a snowboard, your husband, and post all of that here. You  
 7           17           seem like you're lying with not being able to pay your  
 8           18           bills." Poor people can go snowboarding.

9           19           She posted about the fact that I'm unemployed, that I was  
 10           20           in the ER because I -- on December 20th, I overdosed  
 11           21           accidentally. That I had Covid. And again with the  
 12           22           percocet. All of this -- like, if even you get the 911  
 13           23           call, it's redacted by FOIA.

14           24           She has a post in here from somebody else that says: Cher  
 15           25           was soliciting money for her honeymoon fund, and that has my

16           Petitioner's own evidence showing the statement was made by someone other than Gjovik:

17           you. THANK YOU FOR YOUR WORK.

16           214 of 281   Q   Q

QSEA

17           **Dec 20 2021– Public Twitter.com & Medium Post<sup>966</sup>**

- Cher Scarlett (@cherthede): When your ethics and personal morals diverge from a company's, or an industry's, you do something about it or you find a way to leave. Sometimes both. I don't punch down on laborers, but the idea you can't do anything else or that there is no ethical path forward is a lie.<sup>967</sup>
  - o Cher Scarlett (@cherthede): Even in the face of running out of funds to pay bills, I cannot. That doesn't make me superior, morally righteous or anything else but honest. I think what we are asking for is transparency from folks joining morally bankrupt companies who do evil things. You picked a side.<sup>968</sup>
  - o Cher Scarlett (@cherthede): When people say I self-sabotaged my Apple career, it's both true and not true. I started to see the divergence and did something about it. I couldn't do enough, and definitely couldn't continue with a hostile work environment, so I left.<sup>969</sup>
  - o Goo (@StopItCOVID): How are you claiming to run out of funds when you can afford to support your daughter, but Percocet, a snowboard, your husband, and post all of that here? You seem like you're lying about "not being able to pay your bills."<sup>970</sup>

1  
2 Statement was evidence in Gjovik's legal brief about concerted retaliation against labor  
organizers and whistleblowers  
3

4 **U.S. NLRB; U.S. DEPT OF LABOR; CALIFORNIA DEPT OF LABOR**  
ASHLEY GJOVIK V APPLE INC | PROPAGANDA CAMPAIGN V6

- 5 are asking for is transparency from folks joining morally bankrupt companies who do evil things.  
You picked a side.<sup>1052</sup>
- 6
  - **Cher Scarlett (@cherthedev):** When people say I self-sabotaged my Apple career, it's both true and not true. I started to see the divergence and did something about it. I couldn't do enough, and definitely couldn't continue with a hostile work environment, so I left.<sup>1053</sup>
  - **Goo (@StopItCOVID):** How are you claiming to run out of funds when you can afford to support your daughter, but Percocet, a snowboard, your husband, and post all of that here? You seem like you're lying about "not being able to pay your bills."<sup>1054</sup>

7  
8 In legal memo, Gjovik noted account who made post was suspected to be Apple Inc

9 **U.S. NLRB; U.S. DEPT OF LABOR; CALIFORNIA DEPT OF LABOR**  
ASHLEY GJOVIK V APPLE INC | PROPAGANDA CAMPAIGN V6

User	Platform(s)	Bot Scores	Stats	Details
Fred 257 <sup>1477</sup>	Apple Insider		<ul style="list-style-type: none"> <li>• Joined April 2019</li> <li>• 139 Posts</li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
FirstnameBunchofnum bers <sup>1478</sup>	Twitter @FirstNa474 37596		<ul style="list-style-type: none"> <li>• Joined June 2021</li> <li>• 0 Followers / 0 Following</li> </ul>	<ul style="list-style-type: none"> <li>• "I hate bullying"</li> </ul>
Further Parthing <sup>1479</sup>	Twitter @one_more_time_2	Botometer 4.8/5	<ul style="list-style-type: none"> <li>• Joined Jan 2022</li> <li>• 6 tweets</li> <li>• 0 followers</li> </ul>	<ul style="list-style-type: none"> <li>• "When the paparazzi are your friends, it makes your enemies even sweeter"</li> </ul>
FVMAzalea <sup>1480</sup>	Reddit		<ul style="list-style-type: none"> <li>• Joined: May 2020</li> </ul>	<ul style="list-style-type: none"> <li>• Bio: None</li> <li>• Location: None</li> </ul>
Gargarin04 <sup>1481</sup>	MacRumors		<ul style="list-style-type: none"> <li>• 24 comments</li> <li>• Joined Aug 2020</li> </ul>	<ul style="list-style-type: none"> <li>• Bio: None</li> <li>• Location: None</li> </ul>
Genovelle <sup>1482</sup>	Apple Insider Mac Rumors		<ul style="list-style-type: none"> <li>• Joined AI Aug 2008</li> <li>• Joined MR May 2008</li> <li>• 1324 AI posts</li> <li>• 1488 MR posts</li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>
GoAwayThrowaway12 398 <sup>1483</sup>	Reddit		<ul style="list-style-type: none"> <li>• Joined: May 2020</li> </ul>	<ul style="list-style-type: none"> <li>• Bio: None</li> <li>• Location: None</li> </ul>
GoneCollarGone <sup>1484</sup>	Reddit		<ul style="list-style-type: none"> <li>• Joined July 2018</li> </ul>	<ul style="list-style-type: none"> <li>• Bio: None</li> <li>• Location: None</li> </ul>
Goo <sup>1485</sup>	Twitter		<ul style="list-style-type: none"> <li>• Joined Dec 2021</li> </ul>	<ul style="list-style-type: none"> <li>• Bio: none</li> <li>• Location: None</li> </ul>
Guybrush Threepwood <sup>1486</sup>	Twitter		<ul style="list-style-type: none"> <li>• Account Deleted</li> </ul>	<ul style="list-style-type: none"> <li>• n/a</li> </ul>

1477 Apple Insider, <https://forums.appleinsider.com/profile/Comments/239039/Fred257>,  
<https://web.archive.org/web/20220203002555/https://forums.appleinsider.com/profile/Comments/239039/Fred257>

1478 Twitter, <https://twitter.com/FirstNa47437596>, <https://web.archive.org/web/20220202012912/https://twitter.com/FirstNa47437596>

1479 Twitter, [https://twitter.com/one\\_more\\_time\\_2](https://twitter.com/one_more_time_2)/with replies,  
[https://web.archive.org/web/20220131063847/https://twitter.com/one\\_more\\_time\\_2/](https://web.archive.org/web/20220131063847/https://twitter.com/one_more_time_2/)

1480 Reddit, <https://www.reddit.com/user/FVMAzalea>,  
<https://web.archive.org/web/20220203002724/https://www.reddit.com/user/FVMAzalea/>

1481 MacRumors, <https://forums.macrumors.com/members/gagarin04.1227771>

1482 Apple Insider, <https://forums.appleinsider.com/profile/51590/genovelle>; Mac Rumors  
<https://forums.macrumors.com/members/genovelle.184469/>

1483 Reddit, reddit.com/user/GoAwayThrowaway12398/  
<https://web.archive.org/web/20220203002748/https://www.reddit.com/user/GoAwayThrowaway12398/>

1484 Reddit, <https://www.reddit.com/user/GoneCollarGone>,  
<https://web.archive.org/web/20220203002806/https://www.reddit.com/user/GoneCollarGone/>

1485 Twitter, <https://twitter.com/StopItCOVID>,  
<https://web.archive.org/web/20220130030112/https://twitter.com/StopItCOVID/status/1476831719231684609>

1486 Twitter, <https://twitter.com/Guybrush55626232>

23 ASHLEY M. GJOVIK

24 Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 202

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Example 2: March 1 2022 hearing testimony by Petitioner, page 16:

16               This one -- in the document, it says: "Remove details  
17               about Cher's husband, David Reimers being a convicted sex  
18               offender. Which is something that was sealed and relieved  
19               by the State because of the manifest injustice that was done  
20               that we worked really hard to get taken off. It says --

Petitioner's evidence showing the statement with account name removed, implying Gjovik made the statement:

asking her to remove details about Cher's husband, David Reimers, being a convicted sex offender, who was further fined \$30k for failing to register as a sex offender. It's public info. Why should she remove it? <sup>1005</sup>

In legal memo, Gjovik noted account who made post was suspected to be Apple Inc.

**U.S. NLRB; U.S. DEPT OF LABOR; CALIFORNIA DEPT OF LABOR  
ASHLEY GJOVIK V APPLE INC | PROPAGANDA CAMPAIGN V6**

User	Platform(s)	Bot Scores	Stats	Details
Kpkimmel <sup>1505</sup>	Reddit		<ul style="list-style-type: none"> <li>Joined Aug 2016</li> </ul>	<ul style="list-style-type: none"> <li>Bio: None</li> <li>Location: None</li> </ul>
LA Confidential <sup>1506</sup>	Twitter @LAConfidential1	Botomatic: 4.1/5	<ul style="list-style-type: none"> <li>Joined Feb 32022</li> <li>2 Tweets</li> <li>2 Likes</li> </ul>	<ul style="list-style-type: none"> <li>"HR Director"</li> </ul>
LaKobe <sup>1507</sup>	Reddit		<ul style="list-style-type: none"> <li>Account Suspended</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>
Lkrupp <sup>1508</sup>	Apple Insider		<ul style="list-style-type: none"> <li>Joined Jan 2015</li> <li>9,737 posts</li> </ul>	<ul style="list-style-type: none"> <li>n/a</li> </ul>

Statement was evidence in Gjovik's legal brief about concerted retaliation against labor organizers and whistleblowers

1           February 5 2022 – Public Twitter.com Posts

- 2           - **Cher Scarlett (cherthedev)**: This morning I wrote a heartfelt email to someone who has spent the last 2  
months harassing me by any means necessary. I apologized where I felt was just, corrected  
misinformation, and begged for this person to remove personal information about me and my family and  
move forward.<sup>1304</sup>
- 3           o **L.A. Confidential (@LAConfidential1)**: Translation: Cher wrote an email to Ashley Gjovik  
asking her to remove details about Cher's husband, David Reimers, being a convicted sex  
offender, who was further fined \$30k for failing to register as a sex offender. It's public info.  
Why should she remove it?<sup>1305</sup>
- 4            ▪ **L.A. Confidential (@LAConfidential1)**: If Cher didn't falsely claim to be a single mom  
then there would be no reason to look into her husband. It's a matter of public record that  
he is convicted sex offender and was fined again for failing to register.<sup>1306</sup>

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10 **EXHIBIT D**  
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1 EXHIBIT D: Addendum To Legal Memo With Exhibits Of Animus; Excerpt  
2 On Petitioner

3

4 ASHLEY GJOVIK V APPLE INC  
5 INTIMIDATION, THREATS, & OBSTRUCTION | FORBIDDEN ANIMUS PER NAMED PARTIES

- 6
- 7 - 4 Jan 2022: That's right it goes in the **square hole**. [*Video of bird placing objects in different shaped holes.*] (Ricky Mondello)<sup>3</sup>

8 Cher Scarlett (Apple Legal & Global Security)

9 Response to Gjovik's NLRB Filing

- 10 • 9 Sept 2021: Important! The **NLRB** investigates ALL charges brought to its office. **It isn't indicative of prosecution of cases or merit in charges**. I still strongly believe in the case myself and Apple employees have brought regarding unlawful statements and application of rules around pay (Cher Scarlett)<sup>4</sup>

11 Response to Gjovik's Retaliatory Termination

- 12 • 11 Sept 2021: It was still a violation and someone else mentioned one of **her tweets had proprietary information** in it. It's going to be **hard to prove this was retaliatory**. (Cher Scarlett)  
13 • 26 Sept 2021: **She leaked IP** so the retaliatory discharge will be a tough one to prove. She also is now **saying she was suspended and that's not true**. (Cher Scarlett)<sup>5</sup>  
14 • 29 Oct 2021 I honestly feel sorry for the people **who fall for the grifts**. (Cher Scarlett)<sup>6</sup>  
15 • 29 Dec 2021: Someone else got a **Cease & Desist** for printing something [Gjovik] said that wasn't true from Apple. (Cher Scarlett)<sup>7</sup>  
16 • 20 Dec 2021: I suggested another victim get comment from Apple or proof about something she wrote that to my knowledge, from speaking with the person it was about, to protect herself. **She did leak IP, and posted the evidence of it, which is now cited in Apple's defense**. (Cher Scarlett)<sup>8</sup>  
17 • 20 Dec 2021: I quietly warned a handful of people about her behavior towards other people. **I refused to corroborate misrepresentations of fact, and provided contrary evidence**. (Cher Scarlett)<sup>9</sup>

18 Response to Gjovik's EEOC/DFEH Charge & "Right to Sue"

- 19 • 13 Sept 2021: **The EEOC and DFEH have already declined to pursue and given her the right-to-sue** (Cher Scarlett)  
20 • 1 Nov 2021: "If we aren't able to determine if the law may have been violated, we will send you a Notice of Right to Sue." It **DOES NOT mean the evidence justifies a verdict would be in the complainant's favor. When it does, they FIRST attempt to settle**. [EEOC link].<sup>10</sup> (Cher Scarlett)<sup>10</sup>

21 3 Twitter, <https://twitter.com/rmondello/status/1479128619675013120>,  
<https://web.archive.org/web/20220129181249/https://twitter.com/rmondello/status/147912861967501312>

22 4 Twitter, <https://twitter.com/cherthedev/status/1436194928351014942>;

5 Team Blind, See PDF

6 Twitter, <https://twitter.com/cherthedev/status/1454319910427918344>.

7 Text messages, see screenshots

8 Twitter, <https://twitter.com/cherthedev/status/1476684139826802689>.

9 Twitter, <https://twitter.com/cherthedev/status/1476685163660603403>.

10 Twitter, <https://twitter.com/cherthedev/status/1455195681258237957>.

23 ASHLEY M. GJOVIK

24 Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 202

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**ASHLEY GJOVIK V APPLE INC**  
**INTIMIDATION, THREATS, & OBSTRUCTION | FORBIDDEN ANIMUS PER NAMED PARTIES**

- 3 Jan 2022: Both the DFEH and EEOC issued Gjovik right to sue letters, which indicates that while the agencies were unable to determine if law was violated and would not be proceeding on her behalf. (Cher Scarlett via Gjovik's Wikipedia Page)<sup>11</sup>

## Admission to Blacklisting

- 12 Oct 2021: Proud of you. There's really no point in it. **Good News outlets don't take her seriously because her story shifts like a chameleon**, and eventually, it will all work itself out. (Cher Scarlett)<sup>12</sup>
  - 11 Dec 2021: I made the right choice in **exercising the boundary of ejecting them from amplification**. (Cher Scarlett)<sup>13</sup>
  - 5 Feb 2022: **Multiple people reported this person for their behavior to their University as far as I know**. (Cher Scarlett)<sup>14</sup>

#### **Response to Giovik Reporting Unlawful Conduct to the Gov.**

- 25 Oct 2021: Anyone can file complaints with federal and state agencies. It doesn't mean there is merit, and it doesn't mean the person doing the reporting is being honest or genuine in doing so. Hero culture creates parasocial relationships that create scary influence that spreads. (Cher Scarlett)<sup>15</sup>
  - 25 Oct 2021: This is important and nuanced. Whistleblowers are human. Everyone has their own agenda, and if you do not temper your expectations and question motives and information — you can easily get caught up in supporting something completely bogus or worse... something harmful. (Cher Scarlett)<sup>16</sup>
  - 29 Oct 2021: So far, she has tried desperately to use other victims for her own gain, made racist remarks, lied to the public, to the government, about what happened to her, and about me, and a bunch of other people who tried to help her. I cannot stand to watch good people such as yourself get wrapped up in her web. (Cher Scarlett)
  - 13 Dec 2021: "Lions don't concern themselves with the opinions of sheep." I used to think this quote was egotistical, but now, I get it. I see people misunderstand what they read, and believe full-out fabricated nonsense that borders conspiracy, day-in and day-out. There's no reaching them. (Cher Scarlett)<sup>17</sup>
  - 29 Dec 2021: I want to see her get justice, but perjuring herself and doing all of this is harmful (Cher Scarlett)<sup>18</sup>
  - 30 Dec 2021: I am not going to diagnose anyone, but this behavior maps to narcissistic personality disorder, and if it's narcissistic supply driving them, giving it ANY attention only FUELS it

<sup>11</sup> Wikipedia, [https://en.wikipedia.org/w/index.php?title=Wikipedia:Conflict\\_of\\_interest/Noticeboard/Archive&oldid=184](https://en.wikipedia.org/w/index.php?title=Wikipedia:Conflict_of_interest/Noticeboard/Archive&oldid=184).

<sup>12</sup> Twitter, <https://twitter.com/cherthedev/status/1447927265166249997>, <https://web.archive.org/web/20220131033740/https://twitter.com/cherthedev/status/1447927265166249997>.

<sup>13</sup> Twitter, <https://twitter.com/cherthedev/status/1469706762831814657>, <https://web.archive.org/web/20220129183819/https://twitter.com/cherthedev/status/1469706762831814657>

<sup>14</sup> Twitter, <https://twitter.com/cherthedew/status/1490053004791218177>

<sup>15</sup> Twitter, <https://twitter.com/cherthedew/status/1452677821998850048>

<sup>16</sup> Twitter, <https://twitter.com/cherhedew/status/1452677378925219845>

<sup>17</sup> Twitter, <https://twitter.com/cherthedew/status/1470572468661267904>

<sup>11</sup> Text messages, see screenshots

ASHLEY M. GJOVIK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 202

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**EXHIBIT E**  
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1 EXHIBIT E: Twitter Posts Petitioner Testified about but did not Provide  
2 Evidence of

3 **ASHLEY GJOVIK V APPLE INC**  
4 INTIMIDATION, THREATS, & OBSTRUCTION - PROTECTED FEDERAL ACTIVITY v3

5  **Ashley M. Gjøvik**  
6  Hi @Apple, #Apple, @tim\_cook:  
7 Just to be clear, my Jan 11 #NLRB filing will name the  
8 following Apple managers (& ICs as their/your agents), as  
9 known participants in this 5 month harassment &  
10 defamation campaign against me, in retaliation for PA &  
11 filing NLRB charge on Aug 26  
12 2:13 PM - Jan 11, 2022 - Twitter Web App  
13   
14     
15   
16  **Ashley M. Gjøvik** @ashleygjovik · Jan 11  
17 Replying to @ashleygjovik @Apple and @tim\_cook  
18 I recommend you this send the Document Retention notices + some sort  
19 of C&D missive to them now.  
Known Managers: Ricky Mondello, Faye Garfinkle  
Suspected Mgs: Rob Marini, Brad Reigel  
Known ICs: Cher Scarlett/Stewart, Shantini Vyas, Kev Kitchens, Amanda  
Harrison  
Sus ICs: TBD  
20     

21 Twitter: 11 Jan 2022, <https://twitter.com/ashleygjovik/status/1481026531438706689>

22 **ASHLEY M. GJOVIK**  
23 Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 202  
24 Page 65 of 71

**ASHLEY GJOVIK v APPLE INC**  
INTIMIDATION, THREATS, & OBSTRUCTION - PROTECTED FEDERAL ACTIVITY v3



Ashley M. Gjøvik  
@ashleygjovik

卷二

✓ 🌟 My January 10th, 2022 #NLRB charge against @Apple alleging their managers & agents have organized a targeted online harassment campaign against me, in retaliation for Protected Concerted Activity & for filing an NLRB charge on Aug 26th, 2021.  
[nlab.gov/case/32-CA-288...](https://nlab.gov/case/32-CA-288...)



Apple, Inc.

Follow

**Case Number:** 32-CA-288816

Date Filed: 01/10/2022

Status: Open

**Location:** Cupertino, CA

**Region Assigned:** Region 32, Oakland, California

## Docket Activity

七年级上册第10课时

Date: 10

Document

**Issued/Filed By**

◎五十年回憶錄

Journal of Polymer Science: Part A: Polymer Chemistry

M100-66

01/12/2022

**Initial Letter to Charging Party**

NLRB - GL  
NLRB - EC

01/10/2022                      Signed Charge Against Employer\*

**ALT** This document may require redactions before it can be viewed. To obtain a copy, please file a request through our FOIA

2:49 PM · Jan 13, 2022 · Twitter Web App

Twitter: 13 Jan 2022, <https://twitter.com/ashlevgjovik/status/1481760216978837505>

**ASHLEY M. GJOVIK**  
Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2021  
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## **ASHLEY GJOVIK v APPLE INC**

INTIMIDATION, THREATS, & OBSTRUCTION - PROTECTED FEDERAL ACTIVITY v3



Ashley M. Gjøvik  
@ashleygjovik

Replying to @DrakenBikKm

I'm sending all this to the local US DOJ District Attorney office once I've finalized it.

This is beyond administrative & civil.

This is criminal.  

4:18 PM · Jan 31, 2022 · Twitter Web App

Twitter: 31 Jan 2022. <https://twitter.com/ashleygiovik/status/1488305820496322560>

**ASHLEY M. GJOVIK**

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1  
ASHLEY GJOVIK V APPLE INC

2 INTIMIDATION, THREATS, & OBSTRUCTION - PROTECTED FEDERAL ACTIVITY V3



Ashley M. Gjøvik  
@ashleygjovik

...

4  
5 #Apple orchestrated an extensive propaganda &  
6 harassment campaign against me starting with  
damaging false accusations, & numerous threats of  
retaliation, termination, litigation, blacklisting, & violence.  
This is now part of my NLRB, US & CA DOL cases.



scribd.com

8 Ashley Gjovik v Apple Inc - Propaganda Campaign - Final v1  
Ashley Gjovik v Apple Inc - Propaganda, Threats, &  
9 Retaliation Campaign Evidence Report for US NLRB, US ...

10 1:26 PM - Feb 3, 2022 · Twitter Web App

Twitter: 3 Feb 2022, <https://twitter.com/ashleygjovik/status/1489349473968930817>



Ashley M. Gjøvik  
@ashleygjovik

...

12 Replying to @DirectTechYT

13 It's reported as part of my federal & state cases. My  
employment lawyer is including it for the civil case. I'm  
14 also submitting a complaint to the U.S. DOJ District  
Attorney's office. I'm requesting they pull IPs & other data  
to narrow it down. We'll see.



scribd.com

16 Ashley Gjovik v Apple Inc - Propaganda Campaign - Final v1  
Ashley Gjovik v Apple Inc - Propaganda, Threats, &  
17 Retaliation Campaign Evidence Report for US NLRB, US ...

18 6:21 PM - Feb 3, 2022 · Twitter Web App

19 Twitter: 3 Feb 2022, <https://twitter.com/ashleygjovik/status/1489423801733369867>

20  
ASHLEY M. GJOVIK

21 Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 202

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**EXHIBIT F**  
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1 EXHIBIT F: Petitioner's Cat "Evidence"



2  
3 **Ashley M. Gjøvik**  
4 @ashleygjovik

...

5 Here's another interesting one.

6 Cher posted a lot about "growing up poor," like "trap  
7 house" poor, she says.

8 Maybe?

9  
10 But, also, her mom's over here with tassels on her  
11 ottoman & looking like a fucking late 80s/early 90s  
goddess.



12  
13 **Cher Scarlett**  
14 @cherthedeve  
15

Let me tell you a story.

I grew up poor. Not, oh, we have linoleum poor. Poor like the pink slip is the electricity is off again. The note on the door means we're moving again. There are ants coming in through the walls of the one bedroom apartment that is falling apart.

8:25 PM · Jul 29, 2019 · Twitter Web App

16  
17 Sometimes it's weird to be in a different world than the  
18 you grew up in. It can be 30 years before you find  
19 something you thought was normal is a "poor people's  
house" thing.

IM · Sep 26, 2021 · Twitter for iPhone

20 1:48 PM · Jan 9, 2022 · Twitter Web App

21 3 Likes

22  
23 E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik,  
24 King County District Court, case no. 22CIV01704KCX (1 March2022).

1 Cont.



20 NOTE: GJOVIK ATTEMPTED TO REDACT NAMES

21 E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik,  
22 King County District Court, case no. 22CIV01704KCX (1 March2022).

EXHIBIT G

1 EXHIBIT G: Excerpts of Petitioner's e-Filed "Evidence" for the 2/15/2022  
2 and 3/1/2022 Hearings

1                   | Help Center

2 Requests

3

4

5

6 ►Report copyright infringements and abuse

7 2022-02-06 10:32:09 Submt

8

9 Ticket details

10 Cher Scarlett

11 2 days ago

12 **THIS IS AN OFFICIAL NOTIFICATION THAT A USER OF SCRIBD OR SLIDESHARE (choose one):\***

13 Please list the URL(s) on Scribd or SlideShare where the material is found: \*

14

15 **Describe, in as much detail as possible, the nature of the personal information and the exact page(s) where it is located. \***

16 My name is mentioned in this document nearly 400 times ("Cher Scarlett"), and the majority of it is republication of my tweets (which I own, per Twitter's content publication rules), and republication of my Medium posts (which I own, per Medium's content publication rules).

17

18 Most all of the content includes personal information about me, including linking to an old wedding registry containing more former legal name and the name of my husband, my medical diagnoses and other medical and or otherwise private, personal information that would be redacted via FOIA per HIPAA, my former legal name, which I changed for a safety reason and was found just by King County courts in Washington State to not have to be published together because it would pose a threat to my person. Much of the content is also containing republications of my family members' social media accounts, which she found by cyberstalking, and publishing their names. I am a public figure in the space we are working in, and my family members have now faced harassment because she has connected them to me publicly and pointed to their social media accounts without my or their consent.

19

20

21

22 I am seeking an anti-harassment order against her to stop her from posting such content, but it would be

23

24 E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).

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FILED  
FEB 15 2022  
KCDC-East Division  
Redmond Courthouse  
22CIV01704KCX

FILED  
FEB 15 2022  
KCDC-East Division  
Redmond Courthouse

PO BOX 119 SANTA CLARA, CA 95050  
(408) 883-4428

helpful if your company would take it down before it continues to do further harm to me and my family.

**Was this content published by a state, local, or Federal government or court of law in the United States? \***

**Email address:** \* me@cher.dev

 Delaney  
1 day ago

Thank you for contacting Scribd. This content was removed. It may take several days for Google and other search engines to remove deleted links from their indexes.

Best regards,  
Delaney  
Copyright, Abuse, & Privacy Specialist  
Scribd, Inc.

Questions? <https://support.scribd.com/hc>

Cher Scarlett  
1 day ago

**She has re-uploaded the document.**

[https://twitter.com/ashleygjovik/status/1490816438667341824?ctx=HHwWgMCjwd\\_puLApAAAA](https://twitter.com/ashleygjovik/status/1490816438667341824?ctx=HHwWgMCjwd_puLApAAAA)

<https://www.scribd.com/document/557503681/Gjovik-v-Apple-Intimidation-Campaign-Evidence-Report>

Thank you for your urgency,

Cher

Cher Scarlett  
7 hours ago

E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik, King County District Court, case no. 22CIV01704KCX (1 March2022).



1 Petitioner submitted this in evidence on Feb 15 2021 for hearing against Gjovik:  
2  
3



4 **Ashley M. Gjøvik**  
@ashleygjovik

...

5 **The faceless & faced trolls weren't happy**

6 I get 3k word email frm **Apple** Cher saying she reported me  
7 to the FBI; she'll inform Apple if I speak publicly abt **Apple**  
8 threatening me; & demanded I remove info &  
allegations abt her from my fed charges

9 I said NO & she sayz she's suing me now



14 **Ashley M. Gjøvik** @ashleygjovik · Jan 9

...

15 The only thing I asked of this **witch** is stop lying about me & threatening  
people they'll get hurt if they support me

16 Listen I'm all about 1st amendment. Tell people not to support me cause,  
idk, you don't like my elbows

17 But don't lie & don't do it under a banner of labor rights

18 1

19 1

20 5

21

22 E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik,  
King County District Court, case no. 22CIV01704KCX (1 March2022).

1 Petitioner submitted this in evidence on Feb 15 2021 for hearing against Gjovik:



4 **Ashley M. Gjøvik**  
5 @ashleygjovik

...

6 Replying to @ashleygjovik @WarriorWomen4Y and 3 others

7 **On Dec 31 2021 I req Scarlett cease & desist all**  
8 **contact with me, defamation of me, & stop harassing**  
**my friends or I will request a restraining order**

9 Since that warning she tried to SWAT me, got me  
10 banned from Wikipedia, & sent me threatening emails

11 **Plz do not encourage contact**

12 6:45 PM · Feb 12, 2022 · Twitter Web App

13  
14 E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik,  
15 King County District Court, case no. 22CIV01704KCX (1 March2022).

1 Petitioner submitted this in evidence on Feb 15 2021 for hearing against Gjovik:

2

---

3 ← Thread



5 Ashley M. Gjøvik  
@ashleygjovik

...

6 I guess it makes sense now that these months of  
7 targeted harassment & defamation against me that  
8 seemed to try to get me to give up/kill myself, are  
9 starting to appear orchestrated by an Apple coworker  
who used to openly brag about trying to destroy me to  
the point of suicide.

10 3:50 PM · Jan 11, 2022 · Twitter Web App

11 1 Quote Tweet 15 Likes



14 Tweet your reply

Reply



Ashley M. Gjøvik @ashleygjovik · Jan 11

...

16 Replying to @ashleygjovik

Everyone kept asking, why on earth is Cher Scarlett doing this to you? What  
motive does she have to do such awful things?

17 Best guess was: she works in Apple Legal/Security; she's already getting a  
18 payout from Apple

19 But, THIS, this connects all the dots. It all makes sense now.



21

22 ^ In Petitioner's Feb 5 2022 email to Gjovik, which Petitioner submitted as her own evidence,  
she told Gjovik that Petitioner reported Gjovik to "Apple" for posting this & 1 other post

23

24 E-Filed by Petitioner on Feb 15 2022 as Evidence for [REDACTED] v. Ashley Marie Gjovik,  
King County District Court, case no. 22CIV01704KCX (1 March2022).

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**EXHIBIT H**  
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1 EXHIBIT H: Excerpt of The Legal Analysis Memo Gjovik Submitted to the  
 2 US Gov along with the Exhibit/Evidence Memo (Complaint Exhibit D)

3 **ASHLEY GJOVIK V APPLE INC**

4 INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO

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22 **ASHLEY M. GJOVIK**

23 Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
 Ex-Apple Sr. Engineering Program Manager from February 2015 to September 202

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## **INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO**

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Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2022

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**EMR. MOTION FOR. INJ,  
CASE NO. 2:22-CV-00807-RAJ-BAT**

PO BOX 119 SANTA CLARA, CA 95050  
(408) 883-4428

DATED FOR FINAL SUBMISSION: FEBRUARY 7 2022 (1wk before served)

## ASHLEY GJOVIK V APPLE INC

## **INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO**

## Summary

Under information & belief, Apple Inc. (via their managers, employees, & agents), have been orchestrating an extensive propaganda & harassment campaign against Gjovik since August 2021. Under this campaign, Apple Inc has made frequent, damaging false accusations about Gjovik's actions and statements, her motives and character, and her mental health. Apple Inc has also made numerous threats against her related to retaliation, termination, litigation, blacklisting, and violence.

The campaign started while she was still an Apple employee & has been waged by Apple managers under their name & Apple position (*i.e. Ricky Mondello, Faye Garfinkle, Eric Vitiello, DJ Capelis, Bryan Bartow, & others*) as well as current and ex-Apple employees (*Char Scarlett, Shantini Vyas, Amanda Harrison, Kev Kitchens, Steven McGrath, Brian Ganninger, Ankit Aggarwal & others*), again, under their own names & positions at Apple. There also appears to be a large online presence assumably contracted by Apple Global Security which appears to have access to much of her private &/or personal information, and repeats, ad nauseum, specific talking points assumably selected by Apple Inc for this campaign.

This campaign is believed to be being waged in retaliation for Gjovik's protected activity starting in March 2021, and also in retaliation for her reporting Apple Inc's unlawful conduct to the government and law enforcement in the summer of 2021, and continuing to participate in the government investigations. This campaign is believed to be being waged in an effort to chill organizing & unionization efforts at Apple Inc, intimidate witnesses from testifying to what Apple Inc did to Gjovik, coerce Gjovik to withdraw her complaints, and to generally intimidate current Apple Inc employees from speaking out or reporting unlawful activity.

This campaign began shortly after Gjovik started talking to the press and the government about her safety, labor, and discrimination concerns but quickly amplified once she filed formal complaints against Apple Inc with the NLRB, EEOC, U.S. Department of Labor, California Department of Labor, U.S. SEC, U.S. FBI, and other regulatory & law enforcement agencies. Within days of her reports, the frequency and intensity of the abuse dramatically increased, including threats of termination & other retaliation, threats of violence, threats of litigation, threats of bankruptcy, threats against her friends and supporters, and much coercion to drop her government complaints & to not file a lawsuit.

ASHLEY M. GJOVIK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2022

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## ASHLEY GJOVIK V APPLE INC

## **INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO**

## **Gjovik is a Federal Witness, Informant, and Victim**

Starting in March 2021, Ashley Gjovik has engaged in a multitude of activity protected by federal law (amongst protections from state law as well). Gjovik has informed federal government agencies and law enforcement of potential unlawful activity. Gjovik has provided testimony to a federal agency as a witness, she has provided evidence to numerous federal agencies of alleged unlawful conduct, and she has been a victim of violations of federal whistleblower laws.

First, Ms. Gjovik reported concerns about employee safety and possible violations of CERCLA & OSHA internally in March and April, to her management, human resources, employee relations, and the environmental health & safety team. Gjovik quickly faced retaliation and hostility from her manager, quickly followed by retaliation and animus from employee relations, related to her safety concerns and complaints. Gjovik contacted the U.S. EPA Superfund team to ask questions and express concerns, and then began reporting concerns about internal activities to the U.S. EPA for assistance and guidance, and finally requesting intervention by the U.S. EPA on the site due to suspected CERCLA and SOX violations. Gjovik began posting on Apple's "Slack" discussion tool about her concerns about Apple's offices on Superfund sites and talking with the press about her concerns about her office in July 2021.

Gjovik also raised concerns about violations of the Sarbanes-Oxley (SOX) Act in July 2021, leading to her making a formal internal complaint about a conflict of interest within Apple's Board of Directors on August 23 2021 and then filing a Whistleblower tip with the U.S. SEC on September 1<sup>st</sup>, 2021, in addition to the concerns she raised to the U.S. EPA in July, a disclosure Apple was made aware of.

In July 2021, Gjovik raised concerns about an Apple employee apparently smuggling Apple Inc products into Syria and also running a technology business that operates in Syria and facilitates border crossing between Syria & Lebanon. Gjovik had raised concerns to her leadership and the human resources team about potential illegality of the employee's actions under U.S & international sanctions against Syria ten months prior with no response. On July 20 2021, Gjovik escalated the issue to Apple's Business Conduct Global Compliance team who expressed their own concerns. Gjovik informed her leadership she escalated the issue to Business Conduct & then was further retaliated upon by her

ASHLEY M. GJOVIK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2022

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## ASHLEY GJOVIK v APPLE INC

## **INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO**

leadership for this escalation. Gjovik would then file a complaint to the U.S. FBI in on September 3, 2021 about the potential illegality and also the retaliation for raising the concerns.

After Gjovik was suspended in August, she filed charges with the U.S. NLRB, U.S. EEOC, U.S. SEC, U.S. DOJ, and other agencies, capturing the diverse cornucopia Apple's unlawful conduct towards her & her colleagues. Gjovik began providing evidence and witness statements to these federal agencies in late August and early September.

Gjovik was terminated the day she signed off on her statement to the U.S. EEOC and the day before her U.S. NLRB affidavit was to be taken. When Gjovik was unexpectedly contacted by a certified interrogator on Apple's "Workplace Violence" team, insisting she get on the phone with him "within the hour," Gjovik agreed to engage but requested the communication be in writing because, as she wrote Apple, it felt like "witness intimidation the day before her NLRB affidavit." Gjovik also informed Apple that she notified the NLRB of their communications from the "Workplace Violence" team. Gjovik was terminated within hours.

*See: Evidence Report & Evidence of Protected Activities*

ASHLEY M. GJOVIK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 202

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## ASHLEY GJOVIK v APPLE INC

## **INTIMIDATION, THREATS, & OBSTRUCTION - LEGAL MEMO**

### **Federal: Witness, Victim, Informant**

## Cases/Investigations:

- U.S. NLRB 32-CA-281142, 32-CA-283161, 32-CA-284428, 32-CA-284441; & CA-288816
  - U.S. Department of Labor: *Ashley Gjovik v Apple Inc.*, Apple Inc/Gjovik/9-3290-22-051; CERCLA, SOX, & OSHA whistleblower retaliation.
  - U.S. EEOC: *Ashley Gjovik v Apple Inc.*, (556-2021-00608)

### Charges/Complaints/Tips

- **U.S. SEC Whistleblower Tip:** Sept 1, 2021 (#16304-612-987-465); Oct 27, 2021 (#16353-506-600-213)
  - **U.S. DOJ FBI Complaint:** Sept 3 2021; 5 February 2022
  - **U.S. DOJ Antitrust Tip:** Nov 16, 2021 (confirmed by DOJ on Dec 14, 2021)
  - **U.S. DOJ NCDF Complaint:** Sept 3, 2021 10:27pm PST
  - **U.S. DOJ Civil Rights Complaint:** Sept 2, 2021 (#98145-RJH)
  - **U.S. DOJ FCPA Complaint:** Jan 21, 2021 (confirmed by DOJ on Jan 21, 2021)
  - **U.S. EPA Complaint:** April-Aug 2021; August 29, 2021

## **California: Witness, Victim, Informant**

- California Department of Labor: *Ashley Gjovik v. Apple Inc.*, (RCI-CM-842830)
  - California EPA Complaint: Aug 30, 2021 (COMP-51794)
  - Civil Lawsuit: drafting complaint

ASHLEY M. GROVICK

Juris Doctor Candidate & Public International Law Certificate Candidate, Santa Clara University  
Ex-Apple Sr. Engineering Program Manager from February 2015 to September 2021

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**EXHIBIT I**  
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1 EXHIBIT I: Petitioners May 24 2022 Posts

2 6/21/22, 3:36 PM

(337) All mail | ashleymgjovik@protonmail.com | Proton Mail

3

4 Please add post as additional evidence confirming witness tampering,  
intimidation, & retaliation

5 From: Ashley Gjovik <ashleymgjovik@protonmail.com>

6 To Sollett, Mathew <Mathew.Sollett@nrlb.gov>

7 Date: Tuesday, May 24th, 2022 at 6:11 PM

8 Hello,

9 Please add this as additional evidence confirming witness tampering, intimidation, & retaliation.

10 She is responding to this, which I sent NLRB OIG & Asst GC yesterday. <https://ashleygjovik.substack.com/p/field-notes-on-regulatory-captives?view=raw>

11 Please, please, ask again if we can get formal DOJ involvement for what she's doing as federal crimes -- or some other type of help.

12 The stress of all this is making me physical ill.

13 ← Thread



Cher Scarlett @cherthedeve · 8h

Shout out to @NLRB for their studious care with my charges, those that overlap them, and those that are frivolous this past year.

To the investigator out of Region 32 whose character is being attacked:  
Thank you for diligently helping me understand how to hold @Apple accountable

0

1 11:11

0 08

...



Cher Scarlett  
@cherthedeve

From reading my novels unsure of which behavior is or could be illegal, to ensuring they could not get away with unlawful settlements, supplemental affidavits, getting witness testimony, and explaining how we may dismantle the Boeing decision and protect workers:  
THANK YOU.

11:24 AM · May 24, 2022 · Twitter Web App

21 Cher Scarlett @cherthedeve

22 Shout out to @NLRB for their studious care with my charges, those that overlap them, and those that are frivolous this past year.  
To the investigator out of Region 32 whose character is being attacked: Thank you for diligently helping me understand how to hold @Apple accountable

23 [https://mail.proton.me/u/0/all-mail/8HMRY%McRdky-2C98DPkrnYMPV4k0ly88uz7W160NPBTJ\\_NpBuvv03HC-KYFMo0Oka05HmzUdM8sDmY2jw=...](https://mail.proton.me/u/0/all-mail/8HMRY%McRdky-2C98DPkrnYMPV4k0ly88uz7W160NPBTJ_NpBuvv03HC-KYFMo0Oka05HmzUdM8sDmY2jw=...) 1/2